

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

D.J.; TONI CORDOVA; et al.,

Plaintiffs,

Civil Action No. 2:22-cv-00752-CB

v.

UNIVERSITY OF IOWA HOSPITALS AND
CLINICS, an Iowa Entity; et al.,

Defendants.

**DECLARATION OF DR. WILLIAM WILCOX IN SUPPORT OF DEFENDANTS
CEDARS-SINAI MEDICAL CENTER AND DR. WILLIAM WILCOX'S MOTION TO
DISMISS PLAINTIFFS' CLASS ACTION COMPLAINT**

I, Dr. William Wilcox, declare as follows:

1. I am a medical doctor and a clinical, biochemical, and molecular geneticist. I worked at Cedars-Sinai Medical Center ("Cedars-Sinai") in Los Angeles, California from 2009 to 2013.
2. I make this declaration based on my own personal knowledge. If called as a witness to testify thereto, I could competently and truthfully do so.
3. From 2009 to 2013, I was a California resident and citizen.
4. I moved to Atlanta, Georgia in late 2013. I have lived in Georgia from late 2013 to the present.
5. I have never lived in Pennsylvania.
6. I have never been employed in Pennsylvania.
7. I have never had an office in Pennsylvania.
8. I do not have a bank account in Pennsylvania.

9. I am not licensed to practice medicine in Pennsylvania.
10. I have never treated patients in Pennsylvania.
11. I have never treated any of the named plaintiffs in this case.
12. I do not direct advertising or marketing at Pennsylvania.
13. I do not have an authorized agent to receive service of process in Pennsylvania.
14. I do not own or control land in Pennsylvania.
15. I do not have a mailing address or telephone or fax listing in Pennsylvania.
16. Neither of the two Fabrazyme Stakeholders Working Group meetings referenced in the Complaint filed in this action took place in Pennsylvania.
17. I am familiar with the “Guidance to the Fabry Community on the Management of Fabrazyme (asalsidase beta) Supply” filed as Exhibit A to the Complaint in this action and am familiar with the “Revised Guidance to the U.S. Fabry Community: Management of Fabrazyme (agalsidase beta for injection) Supply” filed as Exhibit B to the Complaint in this action.
18. I did not draft either of those two documents. I did not send these two documents to anyone. It was my understanding that these documents were sent by Genzyme to Fabrazyme-prescribing physicians for their consideration. It was not my understanding that these documents would be sent to patients. I did not approve or authorize sending these documents to patients.

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19. I am the only person at Cedars-Sinai who saw these two documents before they were sent.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that this declaration was executed on this 15th day of October, 2022, at Atlanta, Georgia.



Dr. William Wilcox